



June 22, 2021

By Electronic Mail and First Class Mail

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Re: Drummond ABC Coke – Part 1 of Requested Information on 90-Day Status Update, Consent Decree, *United States v. Drummond Company, Inc.* Case No. 2:19-cv-00240-AKK (N.D. AL January 25, 2021); DJ # 90-5-2-1-10717.

Gentlepeople:

This letter is in response to USEPA's June 16, 2021 request for additional information and/or clarification of Drummond's April 24, 2021 submittal of the 90-day milestones required by the above referenced Consent Decree. The responses will be in two parts with this first part addressing comments on the Leak Detection and Repair Program (LDRP) and the second part addressing comments on the Stormwater Overflow Line and Benzene Sampling Training Program. The USEPA asked that the remainder of the requested information be submitted with the Consent Decree's scheduled 180-day Status Update. The USEPA's comments on the LDRP are listed below with Drummond's responses in **bold**.

Leak Detection & Repair Program (LDRP)

1. In the body of the April 24th email, Drummond states that over 8,000 components have been added to the LDRP due to the addition of connectors and enclosing of process equipment.
 - a. Please provide more description on component additions. Was the increase of components primarily due to inclusion of connectors?

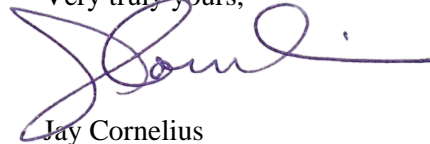
Since March 1, 2021, Drummond has added 10,799 new components, 10,151 (or 94%) of which were connectors and flanges. Of the remaining added components, there were 4 pumps, 6 pressure relief valves, and 638 valves.

- b. Were these components being monitored prior to their inclusion in the revised LDRP?

The entire by-products area is regularly monitored as part of routine AVO walk-through inspections conducted by ABC Coke personnel and in recent years, JCDH has also performed several FLIR surveys of the entire department. Between the AVO and FLIR surveys, the components recently added to the revised LDRP were monitored.

Please contact me if further clarification is needed on the current LDRP. More information on the 180-day milestones (i.e., covers over tar crumb area, FLIR monitoring, Third Party LDAR Audit, etc.) will be contained in the Semi-Annual Report.

Very truly yours,



Jay Cornelius
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